

Law Office of G. Anthony Long
P. O. Box 504970, Beach Road
San Jose, Saipan, MP 96950
Telephone No. (670) 235-4802
Facsimile No. (670) 235-4801

Attorney for Defendant Dong Guk

**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

JUNG SOON LEE, (Deceased))	CIVIL ACTION NO. 05-0031
By SUNG YOUNG LEE, Personal)	
Representative)	
Plaintiff)	
)	DEFENDANT'S REQUEST
v.)	TO ADMIT
DONG GUK CORPORATION)	
)	
Defendant)	
_____)	

TO: PLAINTIFF AND HIS ATTORNEYS OF RECORD:

This request to admit is served upon you by defendant pursuant to Rule 36 of the Federal Rules of Civil Procedure. The responses to this request, which are due within thirty (30) days of service upon you, shall be delivered to the Law Office of G. Anthony Long, P. O. Box 504970, Beach Road, San Jose, Saipan, MP 96950.

A. INSTRUCTIONS FOR USE

1. In this request:
 - (a) The words "you" and "your" means Sung Young Lee, personal representative for Jung Soon Lee, (deceased), which includes the heirs of Sung Young Lee, (deceased).
 - (b) The term "Jung Soon Lee" means Jung Soon Lee, (deceased).

- (c) The term “Accident ” means the motor vehicle accident which occurred on or about August 2, 2004 as alleged in your complaint, which includes the death of Jung Soon Lee, (deceased).
- (d) The term “Lawsuit” means the civil action filed by you in the Commonwealth of the Northern Mariana Islands which was removed to the U. S. District Court for the Northern Mariana Islands and has the Civil action number 05-0031
- (e) The word "person(s)" means all entitles and, without limiting the generality of the foregoing, includes natural persons, joint owners, associations, companies, partnerships, joint ventures, corporations, governmental entities, trusts and estates.
- (e) The word "document(s)" means all written, printed, recorded, and graphic matter, photographic matter or sound reproductions, however produced or reproduced, which includes e-mail and other electronic documents .
- (f) The word “Communication” or “Communications” includes but is not limited to document, documents, or documentation.

Please admit the following:

1. Jung Soon Lee knew Gyu Jin Kim was intoxicated immediately prior to the accident.
2. Jung Soon Lee was a voluntary and willing passenger in the vehicle driven by Gyu Jin Kim at the time of the accident.
3. Jung Soon Lee knew Gyu Jin Kim was intoxicated when Jung Soon Lee voluntarily and willingly became a passenger in the vehicle driven by Gyu Jin Kim immediately prior to the accident.

4. Jung Soon Lee consumed alcohol after 2:00 a.m. on or about August 2, 2004.
5. Jung Soon Lee was intoxicated at the time of the accident.
6. On the night of the accident, Gyu Jin Kim consumed alcohol at business establishments other than defendant's business establishment.
7. On the night of the accident, Jung Soon Lee consumed alcohol at business establishments other than defendant's business establishment.
8. Defendant did not serve Gyu Jin Kim any alcoholic beverage after 2:00 a.m. on or about August 2, 2004, the date of the accident.
9. Jung Soon Lee was not employed at the time of the accident.
10. Jung Soon Lee does not have any children.
11. Jung Soon Lee was not married at the time of the accident.
12. Jung Soon Lee was residing on Saipan at the time of the accident.
13. Gyu Jin Kim's intoxication was not the proximate cause of the accident.

Law Office of G. Anthony Long

By: /s/ _____
G. Anthony Long